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Hon. James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AUBRY MCMAHON,

Plaintiff,

v.

WORLD VISION, INC.,

Defendant.

Case No.: 2:21-cv-00920-JLR

**DECLARATION OF CASIMIR
WOLNOWSKI IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT
ON LIABILITY**

NOTE DATE: MAY 5, 2023

Casimir Wolnowski, upon oath affirms and declares:

1. I am an attorney and the senior managing counsel at Nisar Law Group, P.C., counsel for the plaintiff Aubry McMahon (“Plaintiff”). I am admitted to practice before this Court in this matter *pro hac vice*. I am competent to testify and make the following statements based upon my personal knowledge. If called to testify, I would repeat and affirm each and every statement made herein.

2. Attached as Exhibit 1 is a true and correct copy of an updated job description for the position of “call center customer service representative” posted March 7, 2022, Bates stamped WV000183-88 produced in discovery.

WOLNOWSKI DEC.
2:21-CV-00920-JLR

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NISAR LAW GROUP, P.C.
60 East 42nd Street, Ste. 4600
New York, NY 10165
Ph: (646) 889-1007

3. Attached as Exhibit 2 is a true and correct copy of a job posting for customer service representative, Bates stamped WV000048-50 produced in discovery.

4. Attached as Exhibit 3 is a true and correct copy of a document entitled "WVUS Devotion Guidelines," Bates stamped WV002813 produced in discovery.

I declare under the penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct to the best of my knowledge.

DATED: May 1, 2023 /s/ Casimir Wolnowski